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8 Attorneys for Defendant

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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**  
12 **RENO DIVISION**

13 MATTHEW CHILDERS,	)	Case No: 3:18-cv-00170-RCJ-CBC
14	)	
Plaintiff	)	
15	)	<b>STIPULATION FOR EXTENSION OF</b>
v.	)	<b>TIME TO FILE DEFENDANT'S CROSS</b>
16	)	<b>MOTION TO AFFIRM</b>
NANCY A. BERRYHILL, Acting	)	
17 Commissioner of Social Security,	)	<b>(Second Request)</b>
18	)	
Defendant.	)	
19	)	

20 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security, hereby requests  
21 an extension of time of fourteen days from November 28, 2018 to December 12, 2018, to prepare  
22 and file her cross motion to affirm. This is the Commissioner's second request for an extension.

23 After reviewing the record and Plaintiff's Motion to Remand, the undersigned believes  
24 that this case may be suitable for voluntary remand in lieu of further litigation. The undersigned  
25 therefore respectfully requests this extension of time to attempt to obtain remand authority.

1 On November 28, 2018, Plaintiff's counsel informed Defendant by email that he had no  
2 objection to this extension.

3  
4 Respectfully submitted,

5 Date: November 28, 2018

SHOOK & STONE, CHTD.

6  
7 By: /s/\* John B. Shook

JOHN B. SHOOK

\*authorized by email November 28, 2018

8  
9 Attorneys for Plaintiff

10 Date: November 28, 2018

DAYLE ELIESON

United States Attorney

11  
12 By: /s/ Michael K. Marriott

MICHAEL K. MARRIOTT

Assistant Regional Counsel

13  
14 Attorneys for Defendant

15 Of Counsel

16 Jeffrey Chen

Assistant Regional Counsel

17 Social Security Administration

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20 IT IS SO ORDERED.

21  
22 DATE: 11/30/2018



23 HONORABLE CARLA BALDWIN CARRY  
24 United States Magistrate Judge  
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**CERTIFICATE OF SERVICE**

I, Michael K. Marriott, hereby certify that I caused a copy of Stipulation for Extension of Time to File Defendant's Cross Motion to Affirm to be served, via CM/ECF notification, on:

John B. Shook  
Shook & Stone Chtd.  
710 S. Fourth St.  
Las Vegas, NV 89101

Date: November 28, 2018

DAYLE ELIESON  
United States Attorney

By: /s/ Michael K. Marriott  
MICHAEL K. MARRIOTT  
Assistant Regional Counsel  
  
Attorneys for Defendant